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March 8, 2000

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

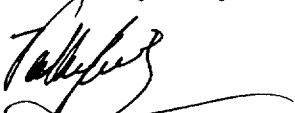
Re: *Petition of the Tennessee Small Local Exchange Company Coalition
For Temporary Suspension of 47 U.S.C. §251(b) and 251(c) Pursuant To
47 U.S.C. §(f)(2) and 47 U.S.C. §253(b)*
Docket No. 99-00613

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Reply of AT&T Communications of the South Central States, Inc. to the Motion to Compel Responses to Discovery Request filed by the Tennessee Small Local Exchange Company Coalition.

Copies are being served on counsel for parties of record.

Yours very truly,


Val Sanford

VS/ghc

Enclosures

cc: Counsel of Record
James P. Lamoureux, Esq.
Garry Sharp

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: *Petition of the Tennessee Small Local Exchange Company Coalition
For Temporary Suspension of 47 U.S.C. §251(b) and 251(c) Pursuant
To 47 U.S.C. §(f)(2) and 47 U.S.C. §253(b)*

Docket No. 99-00613

REPLY OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES,
INC. TO MOTION TO COMPEL RESPONSES TO DISCOVERY REQUEST

AT&T Communications of the South Central States, Inc. ("AT&T") urges the denial of the Motion to Compel Responses to Discovery Request filed by the Petitioners, the Tennessee Small Exchange Company Coalition ("Petitioners") on the ground that the motion states no basis for overruling AT&T's objections.

On January 28, 2000, the Petitioners served discovery requests directed to all the intervenors in this matter including AT&T.

On February 11, 2000, AT&T filed its response to each of those discovery requests. The Petitioners' motion to compel, however, ignores the specific objections raised by AT&T. Instead, the Petitioners base their motion as to AT&T and the other intervenors, other than SECCA, on the notion that the intervenors object "essentially on the basis that the analysis to determine the outcome of this case will presume that 'cream skimming' will occur"; and that if that is the presumption the TRA will follow, then the Petitioners agree to proceed without responses to their discovery.

First, neither Petitioners' characterization of AT&T's position, nor the statements concerning the TRA's position provide any basis for granting a motion to compel.

Second, the Petitioners fail to even purport to demonstrate that their pejorative characterization is anything other than "the economic burden that is typically associated with efficient competition"; 47 C.F.R. §51.405(d).

Third, the Petitioners ignore the specific objections made by AT&T, and do not base their motion on the statutory criteria, as interpreted in the binding FCC rules. The Petitioners advance only vague conclusory generalizations. Nowhere do the Petitioners even attempt to demonstrate why AT&T's objections should be overruled.

The Motion to Compel is without merit on its face and should be denied.

Respectfully submitted,



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South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that I have on this 8th day of March 2000, served a copy of the foregoing Reply of AT&T Communications of the South Central States, Inc. on the following persons via United States Mail, postage pre-paid and addressed as follows:



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